

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SEA-WATCH TECHNOLOGIES, INC. and
LORETTA KISH,

Plaintiffs,

v.

BRUNSWICK CORPORATION,

Defendant.

MBD No. 05-mc-10337 *rwz*

Civil Action No. 04 C 5307

U.S. District Court for the
Northern District of Illinois,
Eastern Division

SUBPOENAED PARTY MAPTECH, INC.'S MOTION FOR PROTECTIVE ORDER

Pursuant to Fed. R. Civ. P. 45(c), Maptech, Inc., ("Maptech"), by its attorneys, hereby moves this Honorable Court for a Protective Order to limit the scope of Maptech's document production and categories for deposition and to provide relief from an unreasonably short time period to respond to Plaintiffs' subpoena dated September 8, 2005. See Subpoena dated September 8, 2005 attached as Exhibit A to Maptech's Memorandum in Support of its Motion for a Protective Order. For the reasons set forth in Maptech's accompanying Memorandum in Support of Its Motion for Protective Order, Maptech respectfully request that this Honorable Court issue a Protective Order modifying the subpoena to: (1) reset the time period by which Maptech must respond to the subpoena dated September 8, 2005 to a more reasonable date, such as by September 30, 2005, (2) limit the scope of the document requests to include only document request Nos. 1, 4 and 5, and (3) limit the scope of the deposition categories to include only deposition categories 1, 2, 4 and 5.

Respectfully submitted,

MAPTECH, INC.,

By: 

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Dated: September 15, 2005

LOCAL RULE 7.1(A)(2) CERTIFICATION

I, Stacey L. Gorman, counsel for Maptech, Inc., hereby certify pursuant to Local Rule 7.1(A)(2) that counsel for Maptech, Inc. conferred with counsel for the Plaintiffs in an effort to resolve or narrow the issues presented in this motion.


Stacey L. Gorman

Dated: September 15, 2005

CERTIFICATE OF SERVICE

I, Stacey L. Gorman, hereby certify that on September 15, 2005, a true and accurate copy of the foregoing Subpoenaed Party Maptech Inc.'s Motion for Protective Order was delivered by facsimile and first class mail to all counsel of record.



Stacey L. Gorman